

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS**

RASTER PRINTING INNOVATIONS, LLC

Plaintiff,

vs.

DELPHAX TECHNOLOGIES INC.

Defendant.

**Case No.: 15-cv-3961**

**DEMAND FOR JURY TRIAL**

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**COMPLAINT FOR PATENT INFRINGEMENT**

Plaintiff Raster Printing Innovations, LLC (“RPI” or “Plaintiff”), by and through its undersigned attorneys, for its complaint against defendant Delphax Technologies Inc. (“Delphax”) (Delphax is referred to herein as “Defendant”), hereby alleges as follows:

**NATURE OF LAWSUIT**

1. This action involves claims for patent infringement arising under the patent laws of the United States, Title 35 of the United States Code. This Court has exclusive jurisdiction over the subject matter of the Complaint under 28 U.S.C. § 1338(a).

**THE PARTIES**

2. RPI is a limited liability company organized under the laws of the state of Illinois and having offices at 111 W. Jackson St., Suite 1700, Chicago, Illinois 60604.

3. RPI owns all right, title and interest in, and has standing to sue for infringement of United States Patent No. 5,796,411 (“the ‘411 patent”), entitled “High resolution real time raster image processing system and method,” issued August 18, 1998. A copy of the ‘411 patent is annexed hereto as Exhibit A.

4. RPI owns all right, title and interest in, and has standing to sue for infringement of United States Patent No. 5,828,814 (“the ‘814 patent”), entitled “Reduced cost high resolution real time raster image processing system and method,” issued October 27, 1998. A copy of the ‘814 patent is annexed hereto as Exhibit B.

5. RPI owns all right, title and interest in, and has standing to sue for infringement of United States Patent No. 5,949,438 (“the ‘438 patent”), entitled “High resolution real time Raster image processing system and method,” issued September 7, 1999. A copy of the ‘438 patent is annexed hereto as Exhibit C.

6. Defendant Delphax is a Minnesota Corporation with a place of business at 6100 West 110th Street, Bloomington, Minnesota 55438. Delphax transacts business and has, at a minimum, offered to provide and/or provided products and/or services in this judicial district and throughout the State of Illinois that infringe claims of the ‘411, ‘814, and ‘438 patents.

7. Venue is proper in this District under 28 U.S.C. §§ 1391 and 1400(b).

#### **DEFENDANT’S ACTS OF PATENT INFRINGEMENT**

8. Defendants have infringed claims of the ‘411, ‘814 and ‘438 patents through, among other activities, making, using, selling and offering for sale various models of Delphax presses and printers in combination with including, but not limited to, Delphax Elan printer line, Pro MICR 907, Pro MICR 1107, Pro MICR 1357, CR2200, CR1500, CR1000, Colordyne CDT-1600 PC Sprint in combination with Global Graphics Harlequin Host Renderer (“HHR”) Raster Image Processor (“RIP”) technology, and other third party compatible print servers.

9. For example, Defendant makes, uses, sells and offers for sale the Delphax Elan printer with the HHR.
10. The HHR is a RIP.
11. The Delphax Elan printers with HHR RIPs include processors in multiple core chips.
12. The Delphax Elan printers with HHR receives display lists.
13. The Delphax Elan printers with HHR receives display lists.
14. The Delphax Elan printers with HHR includes a processor connected to a bus.
15. Delphax Elan printer with a HHR RIP includes an image generator that creates bitmaps based on stored fonts and images.
16. The Delphax Elan printers with HHR includes a screening system for tone generation.
17. The Delphax Elan 500 includes Memjet print heads that fire more than 700,000,000 drops of ink per second.
18. Defendant's infringement has injured and will continue to injure RPI unless and until this Court enters an injunction prohibiting further infringement and, specifically, enjoining further use of products that come within the scope of the '411, '814, and '438 patents.

#### **PRAYER FOR RELIEF**

WHEREFORE, Plaintiffs ask this Court to enter judgment against the Defendants, and against their subsidiaries, affiliates, agents, servants, employees and all persons in active concert or participation with them, granting the following relief:

- A. An award of damages adequate to compensate RPI for the infringement that has occurred, together with prejudgment interest from the date that Defendant's infringement of the RPI patents began;
- B. Increased damages as permitted under 35 U.S.C. § 284;
- C. A finding that this case is exceptional and an award to RPI of its attorneys' fees and costs as provided by 35 U.S.C. § 285;
- D. A permanent injunction prohibiting further infringement, inducement and contributory infringement of the RPI patent; and
- E. Such other and further relief as this Court or a jury may deem proper and just.

**JURY DEMAND**

RPI demands a trial by jury on all issues presented in this Complaint.

Dated: May 5, 2015

Respectfully submitted,

/s/ Anthony E. Dowell

Anthony E. Dowell

[aedowell@dowellip.com](mailto:aedowell@dowellip.com)

DOWELL IP

333 W. North Ave #341

Chicago, Illinois 60610

Phone: (312) 291-8351

**ATTORNEY FOR PLAINTIFF**